



those that would not meet the standard could be corrected by a simple “high pass” audio circuit installed between a microphone of a station and the microphone input.<sup>4</sup>

5. The final sentence on page 5 of the Petition<sup>5</sup> states the real problem in this request for rulemaking. If the Commission were to establish rules limiting the bandwidth of a J3E signal to 2.8 kHz and of an A3E signal to 5.6 kHz, it would force Amateur Radio operators to purchase expensive equipment to continually evaluate the occupied bandwidth of their signals to ensure compliance with the regulations. This equipment would cost far more than the \$15 or \$25 claimed by the Petitioners as the cost for those amateurs utilizing transmitters not meeting the standard.<sup>6</sup> All stations utilizing J3E or A3E emission below 28.8 MHz would be required to purchase this monitoring equipment. Few, if any, Amateur Radio stations already possess the necessary equipment.

6. A similar rule compliance issue exists with Amateur Radio operators complying with the transmitter power standards.<sup>7</sup> While most amateur transmitters operating below 30 MHz already have the capability to measure the power of the transmitter, most stations are operating well below the 1.5 kW PEP limitation. Therefore, an amateur utilizing a 100-watt transmitter would not need special equipment to ensure that the operation met the 1500-watt limitation of the Rules. Furthermore, one would not have to continually monitor the operation of the transmitter to ensure compliance.

7. For the reasons stated, I request that the Commission deny the Petition for Rulemaking.

Respectfully submitted,

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<sup>4</sup> Petition at 5

<sup>5</sup> Most certainly such a device will not guarantee that signals wider than **dejure** standards do not appear but it will go far towards dealing with the problems that are the basis of the complaint in this Petition.

<sup>6</sup> Petition at 5

<sup>7</sup> FCC Rules Section 97.313